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## BEFORE THE ARIZONA CORPORATION COMMISSION

RENZ D. JENNINGS  
CHAIRMAN  
MARCIA WEEKS  
COMMISSIONER  
CARL J. KUNASEK  
COMMISSIONER

AUG 7 1996

Docket No. U-3016-95-402

AUG 7 4 44 PM '96

AZ CORP. COM. DIV.

IN THE MATTER OF THE PETITION OF )  
TCG PHOENIX FOR ARBITRATION PUR- )  
SUANT TO § 252(b) OF THE TELE- )  
COMMUNICATIONS ACT OF 1996 TO )  
ESTABLISH AN INTERCONNECTION )  
AGREEMENT WITH US WEST COMMUNI- )  
CATIONS, INC. )

No. Docket No. U-3016-95-402

DISCOVERY REQUEST OF TCG PHOE-  
NIX TO US WEST COMMUNICATIONS,  
INC.

Pursuant to Commission Rule R14-2-1505(E) TCG Phoenix ("TCG") requests that U S West Communications, Inc. ("U S West") provide within 10 days the following information:

1. Any and all cost studies, computer models, work papers, analysis or any document of any kind upon which U S West proposes to rely to demonstrate the existence of any cost or any proposed rates or charges, associated with the provision of the interconnection services which would be the subject of an interconnection agreement between the parties.

2. All documents that refer or relate to any interconnection agreements (final or interim) U S West has executed with any other telecommunications company, including a copy of each such interconnection agreement.

1 3. All documents that refer or relate to any press releases  
2 issued by U S West with regard to any of the subjects addressed in  
3 § 251 or § 271 of the Telecommunications Act of 1996 (the "Act").

4 4. All documents that refer or relate to U S West's  
5 participation in FCC Docket No. 96-98, including, but not limited to,  
6 U S West's formal and ex parte filings in that proceeding.

7 5. All documents that refer or relate to U S West filings or  
8 positions with regard to the Residual Interconnection Charge ("RIC"),  
9 and any comparable Arizona tariff, including, but not limited to,  
10 filings with:

- 11 a. The FCC;  
12 b. The Arizona Corporation Commission;  
13 c. The federal courts; and  
14 d. Any other state regulatory agency.

15 6. All documents that refer or relate to agreements, publicly  
16 announced positions or other source documents which relate to specific  
17 issues which would be included in a comprehensive interconnection  
18 agreement. Among those issues are:

- 19  
20 • Access to rights of ways, poles, ducts and conduits;  
21 • Collocation, including but not limited to physical  
22 collocation, virtual collocation, shared space  
23 collocation, microwave collocation and mid-span meet  
24 arrangements;  
25 • Rates for unbundled links (loops) including, but not  
26 limited to business links, residential links, ISDN  
capable links, ADSL/HDSL capable links and T-1/DS1  
capable links;

- 1 • Unbundled ports, including but not limited to, line  
2 side and trunk side ports;  
3 • Combination interconnection Trunk Groups (meaning a  
4 trunk group that combines local interconnection traffic  
5 and traffic from jointly provided Switched Access  
6 service);  
7 • Interim number portability;  
8 • Resale discounts;  
9 • Joint provision of wireless service provider access;  
10 • Compensation for termination of local calls;  
11 • Meet point billing arrangements;  
12 • Customer Guide pages in white pages directory;  
13 • Availability of emergency services (911, E-911),  
14 directory assistance and operator call completion  
15 services;  
16 • Billing and collection for Yellow Pages advertising.

17 7. With respect to services identified in (6) above, what are  
18 the prices (if any), terms and conditions upon which U S West would be  
19 willing to make such services available to TCG Phoenix pursuant to  
20 § 251 of the Act?

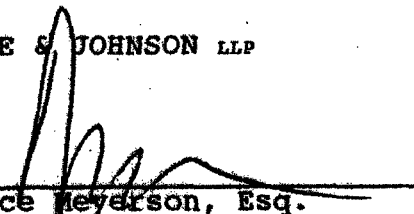
21 8. A list of each person U S West plans to use as a witness,  
22 and a brief description of what each witness will testify about.

23 "Document" is defined in Exhibit A attached hereto.

24 DATED this 7th day of August, 1996.

25 STEPTOE & JOHNSON LLP

26 By

  
Bruce Meyerson, Esq.  
Two Renaissance Square  
40 North Central Avenue, 24th Floor  
Phoenix, Arizona 85004-4453

1 Deborah S. Waldbaum, Esq.  
2 Western Region Counsel  
3 Teleport Communications Group, Inc.  
4 Western Region Office  
5 201 North Civic Drive, Suite 210  
6 Walnut Creek, California 94596  
7 Phone: 510-949-0646  
8 FAX: 510-949-0616

9 Attorneys for TCG Phoenix

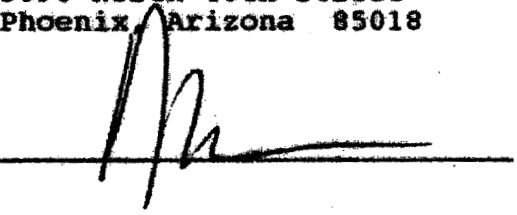
10 ORIGINAL and ten (10)  
11 copies of the foregoing  
12 hand-delivered this  
13 17th day of August, 1996 to:

14 Arizona Corporation Commission  
15 Docket Control Division  
16 1200 West Washington Street  
17 Phoenix, Arizona 85007

18 COPY of the foregoing mailed/  
19 hand-delivered this 17th day  
20 of August, 1996 to:

21 Jerry L. Rudibaugh  
22 Chief Hearing Officer  
23 Arizona Corporation Commission  
24 1200 West Washington  
25 Phoenix, Arizona 85007

26 Gary L. Lane  
Corporate Counsel  
U S West Communications, Inc.  
5090 North 40th Street  
Phoenix, Arizona 85018



## EXHIBIT A

As used herein, the terms "document" and "documents" mean any and all papers, writings and records, of every type and description, in the possession, custody or control of Plaintiff and her investigators, agents, employees and other representatives including, but not limited to, all written, recorded and graphic matter of every type and description, contracts, receipts, purchase orders, canceled checks, drafts, invoice statements, memoranda, corporate minutes, bulletins, intra- and interoffice communications, statements, books of account, worksheets, desk diaries, appointment books, logs, journals, expense accounts, recordings, notes of conversations, correspondence, notes of meetings and conferences, telegraphic communications, stock certificates, pamphlets, schedules, studies, books, computer printouts, reports, photographs, maps, charts, photographic records, evaluations, manuals, mechanical reproductions, periodicals, summaries, telegrams, teletypes, working papers, videotapes, tapes and any other device or medium on or through which information of any type is transmitted, recorded or preserved. The term "document" also means every copy of a document where such copy is not an identical duplicate of the original.